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Attorney for Plaintiffs
ROBIN LEEANN MOORE-BROWN,
individually, and as Special Administrator of the Estate
of FRED NORRIS BROWN III, and for and on
behalf of her three minor children with DECEDENT

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA (LAS VEGAS)

ROBIN LEEANN MOORE-BROWN, individually,
and as Special Administrator of the Estate of FRED
NORRIS BROWN, III; B.B.B, a minor child d/o/b,
03/12/2009; L.L.B, a minor child, d/o/b, 12/02/2013;
and L.K.B, a minor child, d/o/b, 12/29/2018,

Plaintiffs,

vs.

CITY OF NORTH LAS VEGAS (CITY OF NORTH
LAS VEGAS POLICE DEPARTMENT);
ALEXANDER CUEVAS; and DOES 1 -10,
inclusive,

Defendants.

Case No. 2-20-cv-01649-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

(First Request)

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs, ROBIN LEEANN MOORE-BROWN, individually, and as Special Administrator of the Estate of FRED NORRIS BROWN, III, B.B.B, a minor child d/o/b, 03/12/2009, L.L.B, a minor child, d/o/b, 12/02/2013 and L.K.B, a minor child, d/o/b, 12/29/2018 (collectively hereinafter “Plaintiffs”), and Defendants CITY OF NORTH LAS VEGAS (CITY OF NORTH LAS VEGAS POLICE DEPARTMENT) (“CNLV”) and ALEXANDER CUEVAS (“CUEVAS”)(collectively hereinafter the “PARTIES”), by and through their counsel of record, that the discovery cut-off date of May 28, 2021, be continued for a

period of ninety (90) days up to and including **August 26, 2021**, for the purpose of allowing the parties to complete written discovery, take depositions of the parties and witnesses and Rule 30(b)(6) witnesses and disclose expert/rebuttal expert witnesses.

I. DISCOVERY COMPLETED TO DATE

The parties have exchanged their initial Rule 26 Disclosures: by Defendants on December 23, 2020; and by Plaintiff on January 15, 2021.

Plaintiffs have propounded one set of Interrogatories and Request for Production of Documents on Defendant City of North Las Vegas and one set of Interrogatories and Request for Production of Documents on Defendant Alexander Cuevas. Defendants' responses are due on April 15, 2021.

II. DISCOVERY YET TO BE COMPLETED

Defendants intend to propound written discovery on Plaintiffs. After the parties have responded to the written discovery as described above, they collectively anticipate the necessity of taking several depositions. The parties will retain and disclose expert reports and any necessary rebuttal expert disclosures.

III. REASONS WHY REMAINING DISCOVERY HAS NOT YET BEEN COMPLETED

The parties have been diligent in conducting discovery in this matter. As such, additional time is needed due to these issues. There are hundreds of photographs and documents and numerous videos and downloads and electronic evidence that have been produced by defendants that require multiple attorney hours to review and analyze thoroughly.

IV. PROPOSED EXTENDED DEADLINES

The parties respectfully request this Court enter and order as follows:

A. Discovery Deadline.

The current discovery cutoff date of May 28, 2021 should be extended for a period of ninety (90) days, up to and including **August 26, 2021**.

B. Experts and Rebuttal Experts.

The parties shall disclose expert reports sixty (60) days prior to the close of discovery, on **June 28, 2021** (60 days before discovery cutoff is June 27, 2021, a Sunday, therefore, the deadline

1 would be the following business day).

2 The parties shall disclose rebuttal experts thirty (30) days prior to the close of discovery, on
3 **July 27, 2021.**

4 **C. Dispositive Motions.**

5 The parties shall file dispositive motions thirty (30) days after the close of discovery, on
6 **September 27, 2021** (30 days after discovery cutoff is September 25, 2021, a Saturday, therefore,
7 the deadline would be the following business day).

8 **D. Joint Pre-Trial Order.**

9 The parties shall submit the Joint Pretrial Order, pursuant to LR 26(1)(e)(5) thirty (30) days
10 after the date set for filing dispositive motions, on **October 27, 2021**, unless dispositive motions are
11 filed, in which case the date for filing the Joint Pretrial Order shall be suspended until thirty (30)
12 days after the decision on the dispositive motions or further order of this Court.

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1 This request for an extension is made in good faith and joined by all the parties in this case.
2 The request is timely pursuant to LR 26-3; well in advance of any current deadline. Trial is not yet
3 set in this matter and dispositive motions have not yet been filed. Accordingly, this extension will
4 not delay this case. Moreover, since this request is a joint request, neither party will be prejudiced.
5 The extension will allow the parties the necessary time to complete discovery.

6 DATES this 18th day of March, 2021.

7 PETER GOLDSTEIN LAW CORP

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9 By: /s/ Peter Goldstein
Peter Goldstein
Attorneys for Plaintiffs
10 ROBIN LEEANN MOORE-BROWN,
11 *individually, and as Special*
12 *Administrator of the Estate of FRED*
13 *NORRIS BROWN III, and for and on*
behalf of her three minor children with
DECEDENT

By: /s/ Noel E. Eidsmore
Noel E. Eidsmore (SBN 7688)
2250 Las Vegas Boulevard North, Suite 810
North Las Vegas, Nevada 89030
Attorneys for Defendants
CITY OF NORTH LAS VEGAS (CITY OF
NORTH LAS VEGAS POLICE
DEPARTMENT) and ALEXANDER CUEVAS

14 IT IS SO ORDERED

15 DATED this 19th day of March, 2021.

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18 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I am employed in the County of Clark, State of Nevada. I am over the age of eighteen years and not a party to the within action; my business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

I hereby certify that on this 18th day of March, 2021, a true and correct copy of the following document **STIPULATION AND ORDER TO EXTEND DISCOVERY (First Request)** was served by electronically filing with the Court's CM/ECF electronic filing system to the following parties:

Noel E. Eidsmore, Esq.
NORTH LAS VEGAS CITY ATTORNEY
2250 Las Vegas Boulevard North, Suite 810
North Las Vegas, Nevada 89030
Telephone: (702) 633-1050
Facsimile: (702) 649-8879
Email: eidsmoren@cityofnorthlasvegas.com
Attorneys for Defendants City of North Las Vegas (City of North Las Vegas Police Department) and Alexander Cuevas

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

By: 
An Employee of Peter Goldstein Law Corp